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**Pro Hac Vice*

Attorneys for Plaintiff and the Class

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**J. SCOTT THREDE, LOUIS
FLOYD, SYLVIA SCHICK, and
MARIA SCHAFFER**, individually and on
behalf of all others similarly
situated,

Plaintiff,

**v.
BRANDREP, LLC**, a Delaware limited
liability company,

Defendant.

Case No. 3:20-cv-05110-VCS

**STIPULATION FOR EXTENSION OF TIME
FOR DEFENDANT BRANDREP, LLC TO
FILE ITS RESPONSE TO PLAINTIFFS'
COMPLAINT AND TO CONTINUE THE
INITIAL CASE MANAGEMENT
CONFERENCE**

Plaintiffs J. Scott Threde, Louis Floyd, Sylvia Schick, and Maria Schaffer (collectively
“Plaintiffs”) and Defendant BrandRep, LLC (“Defendant” or “BrandRep”), by and through their
respective counsel, hereby stipulate as follows:

WHEREAS, on July 27, 2020, Plaintiffs filed a putative class action complaint
(“Complaint”) against Defendant. (Dkt. 1.)

WHEREAS, on September 2, 2020, BrandRep was served with the Complaint and
Summons (dkt. 12), placing its deadline to respond on or before September 23, 2020.

WHEREAS, on October 5, 2020, the Court scheduled an initial case management
conference on October 27, 2020, at 2:00 p.m. (Dkt. 13.)

1 WHEREAS, counsel for BrandRep reached out to Plaintiffs' counsel and requested
2 additional time to respond to the Complaint. The additional time will permit BrandRep sufficient
3 time to finalize its engagement agreement with its counsel and to review the allegations contained
4 within the Complaint.

5 WHEREAS, the parties also agree that a three (3) week continuance of the October 27,
6 2020 scheduling conference is necessary. The additional time will enable the parties to confer
7 regarding their respective views of the case and formulate a joint case management statement.

8 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendant, through their
9 counsel, as follows:

- 10 1. Defendant shall answer or otherwise respond to Plaintiff's Complaint on or before
11 November 13, 2020.
- 12 2. The case management conference scheduled on October 27, 2020 should be continued
13 until November 17, 2020.

14 Respectfully submitted,

15 Dated: October 20, 2020

16 **J. SCOTT THREDE, LOUIS FLOYD, SYLVIA**
17 **SCHICK, and MARIA SCHAFFER**, individually
18 and on behalf of all others similarly situated,

19 /s/ Taylor T. Smith

20 One of Plaintiffs' Attorneys

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Counsel for Plaintiffs and the Class

1 Dated: October 20, 2020

BRANDREP, LLC

2 /s/ George C. Hutchinson

3 George C. Hutchinson
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Counsel for Defendant

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12 **SIGNATURE CERTIFICATION**

13 Pursuant to Civil L.R. 5-1(i)(3) of the Electronic Case Filing Administrative Policies
14 and Procedures Manual, I hereby certify that the content of this document is acceptable to
15 counsel for Defendant and that I have obtained authorization to affix his or her electronic
signature to this document.

16 By: /s/ Taylor T. Smith
17 Taylor T. Smith
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via Court's ECF system on October 20, 2020.

/s/ Taylor T. Smith